

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN**

STEPHEN D. ARTHUR,
Plaintiff,

vs.

CASE NO.

Judge
Magistrate Judge

TRANS UNION, LLC, a Delaware limited liability
company; and FIRST PREMIER BANK,
a foreign corporation;
Defendants.

TRANS UNION, LLC'S NOTICE OF REMOVAL

Pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, Defendant Trans Union, LLC ("Trans Union") hereby removes the subject action from the 32A District Court, Wayne County, Michigan, to the United States District Court for the Eastern District of Michigan, on the following grounds:

1. Plaintiff Stephen D. Arthur ("Plaintiff") served Trans Union on or about November 3, 2016, with a Summons and Complaint filed in the 32A District Court, Wayne County, Michigan. Copies of the Summons and Complaint, as received, are attached hereto, redacted pursuant to Federal Rule of Civil Procedure 5.2, as **Exhibit A** and **Exhibit B**. No other process, pleadings or orders have been served on Trans Union.

2. Plaintiff makes claims under, alleges that Trans Union violated and alleges that Trans Union is liable under the Fair Credit Reporting Act, 15 U.S.C. § 1681 et seq. (the “FCRA”). See Complaint ¶¶ 27-40.

3. This Court has original jurisdiction over the subject action pursuant to 28 U.S.C. § 1331 since there is a federal question. As alleged, this suit falls within the FCRA which thus supplies this federal question.

4. Pursuant to 28 U.S.C. § 1441, et seq., this cause may be removed from the 32A District Court, Wayne County, Michigan, to the United States District Court for the Eastern District of Michigan.

5. Counsel for Trans Union has confirmed with the 32A District Court, Wayne County, Michigan, by telephone, that they have no document or file suggesting any other Defendant has been served. To the best of Trans Union’s knowledge, no other named Defendant in this matter has been served as of the date and time of this Notice Of Removal.

6. Notice of this removal will promptly be filed with 32A District Court, Wayne County, Michigan and served upon all adverse parties.

WHEREFORE, Defendant Trans Union, LLC, by counsel, removes the subject action from the 32A District Court, Wayne County, Michigan to the United States District Court, Eastern District of Michigan.

Respectfully submitted,

s/ Laura K. Rang

Laura K. Rang, Esq. (IN #26238-49-A)
Schuckit & Associates, P.C.
4545 Northwestern Drive
Zionsville, IN 46077
Telephone: 317-363-2400
Fax: 317-363-2257
E-Mail: lrang@schuckitlaw.com

*Lead Counsel for Defendant, Trans Union,
LLC*

Brian A. Nettleingham, Esq. (MI #P58966)
Maddin, Hauser, Wartell, Roth
& Heller, P.C.
28400 Northwestern Hwy., 3rd Floor
Southfield, MI 48034
Telephone: 248-359-7503
E-Mail: ban@maddinhauser.com

*Local Counsel for Defendant, Trans Union,
LLC*

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN**

STEPHEN D. ARTHUR,
Plaintiff,

CASE NO.

vs.

Judge
Magistrate Judge

TRANS UNION, LLC, a Delaware limited liability
company; and FIRST PREMIER BANK,
a foreign corporation;
Defendants.

CERTIFICATE OF SERVICE

I, **Laura K. Rang**, hereby certify that on the **7th day of November, 2016**, I electronically filed the foregoing with the Clerk of the Court using the ECF systems which will automatically send notification of such filing to the following counsel of record:

| | |
|------|--|
| None | |
|------|--|

I further certify that on the **7th day of November, 2016**, a copy of the foregoing was sent via U.S., First Class Mail, postage prepaid to the following non-ECF participants:

| | |
|---|--|
| <u>for Plaintiff Stephen D. Arthur</u> Gary D. Nitzkin, Esq. Travis Shackelford, Esq. Michigan Consumer Credit Lawyers 22142 West Nine Mile Road Southfield, MI 48033 | |
|---|--|

s/ Laura K. Rang

Laura K. Rang, Esq. (IN #26238-49-A)

Schuckit & Associates, P.C.

4545 Northwestern Drive

Zionsville, IN 46077

Telephone: 317-363-2400

Fax: 317-363-2257

E-Mail: lrang@schuckitlaw.com

*Lead Counsel for Defendant, Trans Union,
LLC*